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Subject:			Filed: File Number:	
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elendar Date File	ed: 08/12/1998 4:28:44 PM	Date Disseminated		
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98-143 8/12/98 FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

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In general, I support the FCC goal of streamlining the license classes for Amateur Radio. However, I see several problems with the proposed method.

The foremost is that the current proposal eliminating Novice and Technician Plus also eliminates the entry-level 5-wpm CW exam. This means that any amateur wishing to use the HF portion of the spectrum would have to pass a 13-wpm exam. This would seem to be a considerable barrier to hams wishing to experience long-distance communications.

Personally, I feel that the CW exam has outlived its usefulness for the ham community. While I do see that some basic familiarity with it (such as the 5-wpm exam would demonstrate) is important, I don't see why facility in this particular operating mode is given preference over the other modes (phone, video, and digital, for example) for which no test of proficiency is required. I do not wish to disparage those who choose to operate CW; I just feel that HF has grown to include much more than just CW, and the current CW exams don't reflect that fact.

I also think that there needs to be consideration that different people enter ham radio to do different types of things. I believe that the Novice Class is currently unpopular because it is quite restrictive in the operating modes it allows. I think that an entry-level HF class which allowed full HF operation would be more attractive to many people.

So I would propose the following licensing structure:

Basic-H Class: (current Technicians) exam covering general operating procedures for VHF and above; would allow use of VHF and above ham bands in modes and frequencies of current General Class

Basic-L Class: (current Novices) exam covering general operating procedures for HF plus a 5-wpm CW exam; would allow use of HF bands in modes and frequencies of current General Class

General Class: (current Tech Plus and General) passing both Basic-H and Basic-L exams; same operating rights as current Advanced Class, but don't act as VEs

Extra Class: (current Advanced and Extra) exams cover advanced technical matters, VE procedures, EMI/EMC issues, and advanced operating procedures, perhaps with a 12-wpm CW exam; same operating rights as current Extra, plus act as VEs

This structure would provide separate entry paths for those wishing to operate on HF bands for long-distance communications and for those wishing to operate on VHF or higher bands for short-distance communications. There is then a second step where these are consolidated into full operating rights. Finally, there is a class for those who have further improved their skill level.

Thank you for your consideration of this comment,

Jonathan Dixon, KB0ZRU